

JUDITH KNECHTGES,
Plaintiff,
v.
NC DEPARTMENT OF PUBLIC
SAFETY, et al.,
Defendants.

I, Terri Catlett, being competent to testify and having personal knowledge of the matters herein, hereby state as follows:

1. I am an adult over the age of 18, have never been adjudged incompetent, suffer from no mental or emotional illness, and make this declaration of my own free will, stating facts of which I have personal knowledge.

2. I have reviewed the Complaint filed by Ms. Knechtges, including the allegations she makes against me.

3. During the relevant time, I was employed by the North Carolina Department of Public Safety as the Director of Healthcare Administration.

4. In my role as Director of Healthcare Administration, I had absolutely no involvement with the hiring process for the CEO Position, including whether Ms. Knechtges was selected for the job or another candidate was chosen.

5. When Ms. Knechtges left the role as Interim CEO and returned to her regular position, I was not in her chain of command.

6. In no way did I change my behavior towards Ms. Knechtges, while she served as the Interim Chief Executive Officer at the Central Prison ("Interim CEO") or when she returned to Central Pharmacy from being relieved of that interim post in early 2019.

7. I did or said nothing that could be construed as retaliation against Ms. Knechtges during her tenure as Interim CEO or when she returned to the Apex Pharmacy. This includes but is not limited to excluding her in lunch plans and social outings with co-workers as she alleges. I also did not retaliate by changing her job duties or excluding her from meetings and emails.

8. At no time ever did I make inappropriate or offense comments, jokes, or asked question to or about Ms. Knechtges regarding her race, national origin, sex or age.

9. Ms. Knechtges did discuss with me our prior working relationship and she shared rumors she heard of comments purportedly made by me which were completely not true.

10. At no time did I treat Ms. Knechtges differently due to her membership in a particular protected class or class status.

11. Upon information and belief, the only meetings and communications Ms. Knechtges may not have been brought into were pertaining to projects that she was not involved.

12. At no time did I give Ms. Knechtges, the "silent treatment" or exclude her from lunch as she alleges.

FURTHER THE DECLARANT SAYETH NOT.

Pursuant to 28 U.S.C. § 1746(2), I verify under penalty of perjury that the foregoing Declaration is true and correct in substance and in fact to the best of my knowledge and belief.

Respectfully submitted this the 17th day of May, 2023.

A handwritten signature in blue ink, reading "Terri Catlett", written over a horizontal line.

Terri Catlett